

REMARKS/ARGUMENTS

These Remarks are in response to the Office Action mailed February 21, 2006.

Claims 1-39 and 41-56 were pending in the Application prior to the outstanding Office Action. The Office Action rejected claims 1-39 and 41-56. Reconsideration of the rejections is requested.

I. Claim Rejections Pursuant to 35 U.S.C. § 103(a)

The examiner rejected claims 1-9, 11-12, 14-15, 26, 38-39, 42, 51, and 53 as being unpatentable over Reber (U.S. Pat. No. 5,903,729) (hereinafter "Reber").

In particular, claims 1, 5, 39, and 51 were rejected over Reber.

Claims 10, 16-17, 41, and 52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber and further in view of Wright (U.S. Publication No. 2002/0091679 A1) (hereinafter "Wright").

Claims 18-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber in view of Wright and further in view of Carro (U.S. Publication No. 2001/0056439 A1) (hereinafter "Carro").

Claims 22-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber in view of Wright and Carro and further in view of Ingram (U.S. Publication No. 2002/0052890 A1) (hereinafter "Ingram").

Claim 21 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber in view of Wright and Carro and further in view of Sundaresan (U.S. Pat. No. 6,651,058 B1) (hereinafter "Sundarasan").

Claims 13, 24, 43, and 54 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber and further in view of Carro.

Claim 25 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber in view of Carro and further in view of Ingram.

Claims 27, 31-33, 36-37, 45, and 48-50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber and further in view of Ingram.

Claims 28, 44, and 55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber and further in view of Bays (U.S. Publication No. 2003/0018632 A1).

Claims 30 and 47 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Reber in view of Bays and further in view of Ingram.

II. Argument

Claims 1, 5, 39, and 51:

The examiner suggests that independent claims 1, 39, and 51, and dependent claim 5, are obvious over Reber. In particular, the examiner admits that "Reber does not disclose expressly an annotation to the document," but argues that "it would have been obvious to one of ordinary skill in the art at the time of the invention to conclude that the indication, or mark, of Reber is equivalent to the annotation of the Instant Invention." Office Action at 6. Applicant respectfully disagrees.

The examiner has failed to make a *prima facie* case of obviousness, and has used impermissible hindsight in rejecting independent claims 1, 39, and 51, and dependent claim 5.

To establish a *prima facie* case of obviousness, three basic criteria must be met: (1) there must be a suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; (2) there must be a reasonable expectation of success; and (3) the reference(s) must teach or suggest all the claim limitations. MPEP § 706.02(j).

As to the requirement that the cited art "teach or suggest all the claim limitations, the Federal Circuit Court of Appeals long has held that impermissible hindsight results when the examiner assumes obviousness based on a limitation not found in the cited art:

To imbue one of ordinary skill in the art with knowledge of the invention in suit, when no prior art reference or references of record convey or suggest that knowledge, is to fall victim to the insidious effect of a hindsight syndrome wherein that which only the inventor taught is used against its teacher.

W.L. Gore & Assocs. V. Garlock, Inc., 721 F.2d 1540, 1553 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984). "Skill in the art does not act as a bridge over gaps in substantive presentation of an obviousness case, but instead supplies the primary guarantee of objectivity in determining obviousness." Donner, I.H., Patent Prosecution Practice & Procedure Before the

U.S. Patent Office, 3d ed. at 759 (2003) (citing *Ryko Mfg. Co. v. Nu-Star, Inc.* 950 F.2d 714, 718 (Fed. Cir. 1991)). Also:

The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious *unless the prior art suggested the desirability of the modification*. [The prior art cited] fail[s] to suggest any motivation for, or desirability of, the changes espoused by the Examiner and endorsed by the Board.

It is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.

Donner at 779 (citing *In re Fritch*, 972 F.2d 1260 (Fed. Cir. 1992)) (emphasis supplied).

Here, the examiner has used impermissible hindsight by relying on Reber in advancing its rejection under section 103. Specifically, the examiner has admitted that Reber does not expressly disclose an annotation, so the examiner has admitted that Reber does not teach or suggest modifying Reber to supply the missing limitation of claims 1, 5, 39, and 51. To make the section 103 rejection, the examiner has relied on the cited art "as a bridge over gaps in substantive presentation of an obviousness case" by indicating that the "mark" made in Reber is equivalent to an "annotation" as taught in claims 1, 5, 39, and 51 of the present disclosure. Nothing in Reber suggests that annotation, as opposed to merely marking, is desirable. Failure of the examiner to provide the necessary suggestion or motivation to modify the cited art creates a presumption that selection of the reference was based on hindsight. Donner at 780 (citing *In re Rouffet*, 149 F.3d 1350 (Fed. Cir. 1988)). Accordingly, Applicant respectfully requests reconsideration of the rejection of claims 1, 5, 39, and 51, and a Notice of Allowance.

Moreover, to the extent that the examiner might argue that he might have relied on his own personal knowledge (which the examiner did not state), the examiner's ability to use his personal knowledge is qualified by 37 C.F.R. section 1.104: "When a rejection in an application is based on facts within the personal knowledge of an employee of the Office, *the*

data shall be as specific as possible . . ." (emphasis added). Here, the examiner has not raised any data or which he is personally aware.

Further, the examiner has not even attempted to show that one of ordinary skill in the art would have had a reasonable expectation of success in modifying Reber to teach the Applicant's claims. In fact, Reber arguably teaches away from the present invention. The examiner suggests that one of ordinary skill in the art would modify Reber so that the indication, or mark, would be equivalent to the annotation in the present application. First, the indication and the mark or tag in Reber are two different things. As disclosed in Reber, and indication is a symbol having borders that the end user marks with a mark or tag to indicate interest in a resource. *See, e.g.*, Col. 6, line 66-Col. 7, lines 4-5. Thus, Reber teaches marking only in a discrete area outside and apart from the image/data. In contrast, claim 1 of Applicant's disclosure, for example, teaches free-form annotating. That is, the anchor can be "proximate to or within the annotation." *See, e.g.*, specification at ¶¶ [0040], [0041].

Because the examiner has not and cannot make a *prima facie* case of obviousness based on Reber, independent claims 1, '39, and 51, and dependent claim 5 are patentable over the cited art. Applicant respectfully requests reconsideration of the rejections.

Because claim 1 is allowable over the cited art, Applicant respectfully submits that all claims depending directly or indirectly from claim 1 also are allowable, *i.e.*, claims 2-38. Because claim 39 is allowable over the cited art, Applicant respectfully submits that all claims depending directly or indirectly from claim 39 also are allowable, *i.e.*, claims 39-50. Because claim 51 is allowable over the cited art, Applicant respectfully submits that all claims depending directly or indirectly from claim 51 also are allowable, *i.e.*, claims 52-56.

Further Remarks are provided herein below to address rejections of certain dependent claims.

As to dependent claim 3, the examiner suggests that the claim is obvious because "Reber discloses that the detecting code detects an anchor that represents an implicit link . . ." Office Action at 6 (citing Reber at Col. 4, lines 44-53). Applicant respectfully disagrees. The claimed "detect[] and anchor that represents an implicit link" does not equate with Reber's disclosure. The specification of the instant application at ¶ [0042] establishes that an "implicit anchor" "may be implicitly defined, *such as by grammar one uses to identify documents in*

certain forms or citations." (emphasis supplied). A human must be able to read and understand the implicit anchor, according to claim 3 of the present application. In contrast, Reber discloses a data item that cannot be understood by a human. The cited text of Reber discloses, "the first data item 16 and the second data item 18 can be machine-readable but *practically indiscernible by most humans.*" Accordingly, the claimed limitation of claim 3 is not obvious over the cited art, and reconsideration of the rejection of claim 3 on this additional basis respectfully is requested.

As to dependent claim 11: The examiner suggests that Reber discloses that "the format includes displaying the annotated anchors according to annotated anchor metadata. Office Action at 7 (citing Reber, Col. 11, lines 62-67). Applicant respectfully disagrees.

Applicant's disclosure makes clear that "metadata of the annotated anchor" includes "the link it represents, its location in the document, etc." Specification at ¶ [0063]. In other words, this information is data about the anchor. In contrast, the cited text of dependent claim 11 makes no mention of metadata. Instead, the cited text refers to "textual information ('Yahoo!', 'CNET', 'Motorola', and 'Infoseek') corresponding to the tagged resources of the network navigation device described with reference to Fig. 2." The "textual information . . . corresponding to the tagged resources" is nothing more than an oblique way of referring to a mere name for the tagged resources. The disclosure of Reber thus does not enable "metadata of the annotated anchor," and thus does not disclose this limitation. For this additional reason, Applicant respectfully requests reconsideration of the rejection of claim 11.

As to dependent claim 12: The examiner suggests that Reber discloses "annotated anchor metadata include a number of anchors within the documents representing the target." Office Action at 7 (citing Reber Col. 9, lines 35-38). Applicant respectfully disagrees. The cited text does not disclose "annotated anchor metadata." The cited text actually discloses recognizing whether little empty symbols (the "indications") are checked or not. There is no disclosure to recognize any type of metadata associated with the anchor. Accordingly, for at least for the reasons delineated above in connection with claim 11, Reber does not disclose this limitation of dependent claim 12. Reconsideration of the rejection respectfully is requested.

As to dependent claims 14 and 42: The examiner suggests that Reber discloses “where the format includes displaying the annotated anchors according to target [meta]data.” Office Action at 8 (citing Reber, Fig. 6, Col. 11, lines 62-67). Applicant respectfully disagrees. The examiner cited the identical disclosure in support of his suggestion that claim 11 was obvious (limitation relating to annotated anchor metadata). The “textual information . . . corresponding to the tagged resources . . .” cannot disclose at once “annotated anchor metadata” (*i.e.*, data about the annotated anchor, such as the link it represents, its location in the document, etc.) and “target metadata” (*i.e.*, data about the target documents, such as its title, author, size, when created, etc.) and in any case, as explained in connection with claims 11–13, the cited text does not disclose metadata at all. Applicant respectfully requests reconsideration of the rejection.

As to dependent claims 15 and 53: The examiner suggests that Reber discloses “the target is a second document.” Office Action at 8 (citing Reber Col. 12, lines 9-17). Applicant respectfully disagrees because the cited text does not disclose the target is a second document. Instead, the cited text of Reber refers to Fig. 7, and characterizes Fig. 7 as “an illustration of a second display screen . . . displayed upon receiving a user-initiated selection of a resource . . .”. In other words, the “second display screen” is not a second document; rather, it is the destination displayed after the user clicks on the image associated with a listed resource. Accordingly, Reber does not disclose each limitation of claims 15 and 53, and for this additional reason, Applicant respectfully requests reconsideration of the rejections.

As to dependent claim 26: The examiner suggests that Reber discloses “where the processing code includes obtaining the second documents.” Office Action at 8 (citing Reber Col. 12, lines 18-23). Applicant respectfully disagrees for the same reasoning that applies to claims 15 and 53, above, applies to claim 26. Applicant respectfully requests reconsideration of the rejection.

As to dependent claim 38: The examiner suggests that Reber discloses “where the [third] processing code includes displaying the annotated anchor and the target.” Office Action at 8 (citing Reber Col. 12, lines 9-23). Applicant respectfully disagrees. The cited text refers to Fig. 7 of Reber. Neither Fig. 7 nor the cited text discloses “displaying the annotated anchor” as taught in claim 38 of the present application. The examiner has suggested that the

term “indication” and “mark” as used in Reber equate to the “annotation” of the present application. *See, e.g.*, Office Action at 5-6 (rejecting claims 1, 5, 39, and 51). Accordingly, it is inconsistent for the examiner to suggest that an “annotated anchor” is disclosed in Fig. 7 of Reber, because no “indication” or “mark” appears in Fig. 7 or is disclosed in the cited text. At least for this additional reason, Applicant respectfully submits that claim 38 is not obvious over the cited art, and requests reconsideration of the rejection.

As to dependent claims 10, 41, and 52: The examiner suggests that Wright discloses displaying anchors according to metadata or attributes, such as color, size, or shape. Office Action at 9. Applicant respectfully disagrees. Again, as with all other dependent claims discussed specifically above and throughout these Remarks, the claims are non-obvious over the cited art at least because Reber does not disclose each of the limitations of the claims of the present application. The examiner relies on the same suggestions as for Reber alone as for Reber taken in combination with Wright.

Moreover, while Wright discloses that “one or more *objects* of the search” can be “annotated,” Wright ¶ [0012] (emphasis added), the cited text of Wright *does not* disclose annotating *the anchor* (or in Wright’s terminology, annotating the “link”; see Wright ¶ [0014]) and then detecting annotations in anchors/links to carry out a process on such annotated link. Rather, the cited text discloses that “[d]isplay attributes may be determined by *object* [i.e., not annotated anchor] metadata.” (emphasis added). An “object” is not the same as a link, as disclosed in Wright; rather, an object is referred to by a “link.” See Wright ¶¶ [0014], [0015]. Because a link is like an “anchor” of the present disclosure, and an object is akin to a target of the present disclosure, Wright does not disclose annotating an anchor. Moreover, for the same reasons, “object metadata” in Wright cannot be equated with “annotated anchor metadata” in the present claims. Accordingly, Reber in combination with Wright does not render obvious claims 10, 41, and 52, and Applicant respectfully requests reconsideration of the rejections.

As to dependent claims 16-17: The examiner suggests that Wright discloses code which includes adding anchors or hyperlinks to a data structure based on at least one attribute and that the data structure has a number of hyperlinks that have at least one attribute value. Office Action at 9 (citing Abstract). Applicant respectfully disagrees. The examiner has not indicated how Wright might disclose how *annotated* anchors are disclosed. As remarked

above, Reber does not disclose or suggest this limitation. Accordingly, Applicant respectfully requests reconsideration of the rejections.

As to dependent claims 18-20: The examiner suggests that Carro discloses including the position of the marked or annotated item. Office Action at 10 (citing Carro ¶ [0055]). Applicant respectfully disagrees with the rejections at least for the reasons set forth above as to Reber, and Reber combined with Wright. Applicant respectfully requests reconsideration of the rejections.

As to dependent claims 22-23: The examiner suggests that Ingram discloses that the annotated anchors of Reber, Wright, and Carro each represent a link to at least one target and where the format includes displaying the annotated anchors according to the target metadata. Office action at 11-12 (citing Ingram ¶¶ [0039]-[0040]). Applicant respectfully disagrees, at least for the reasons stated above in connection with Reber, and Reber combined with Wright.

Ingram relates to software that enhances hyperlinks. In particular, Ingram discloses an enhanced hyperlink and method for providing an enhanced hyperlink. Ingram further discloses that the invention permits the user to interact with a hyperlink in a variety of ways without necessarily having to open and/or follow the hyperlink. Ingram ¶ [0003]. In one embodiment, Ingram teaches keeping a reference “anchored” or “docked” to the computer screen while the user visits other hyperlinked media. Ingram ¶ [0041]. The user does not create any annotation of links (or “anchors,” in the terminology of the present application). Moreover, no code exists for identifying annotated links/anchors for further processing, as taught in claim 1 of the present application.

Further, the cited text of Ingram does not disclose any “data structure” or “format” for displaying annotated anchors.” Instead, the cited text discloses how a “docked” hyperlink residing at the edge of the desktop can be opened to the linked page and minimized on a task bar. The cited text does not disclose “displaying the annotated anchors according to the target metadata,” as the examiner suggests. The operation has nothing at all to do with metadata. It simply discloses opening/minimizing a docked hyperlink. Accordingly, Applicant respectfully requests reconsideration of the rejection of claims 22-23 based on these additional Remarks.

As to dependent claim 21: The examiner suggests that Sundaresan discloses "associating hyperlinks according to their metadata." Office Action at 13 (citing Sundaresan Col. 8, lines 63-67; Col. 9, lines 1-8). Applicant respectfully disagrees for at least the reasons set forth above in connection with Reber and with Reber in combination with other cited references.

As to dependent claims 13, 24, 43, and 54: The examiner rejected these claims as obvious over Reber and further in view of Carro. Office Action at 13. Applicant respectfully disagrees at least for the reasons set forth in connection with Reber and with Reber in combination with the other cited references.

Claim 13: The examiner suggests that Carro discloses "a number of marks associated with a target." Office Action at 14 (citing Carro ¶ [0055]). The examiner already has suggested that the marking equates with annotating an anchor. Office Action at 10, rejection of claims 18-20. It is inconsistent for the examiner now to suggest that Carro discloses marking a target. Accordingly, Applicant respectfully requests reconsideration of the rejection of claim 13.

Claims 24, 43, 54: The examiner suggests that Carro discloses "determining whether the second document is stored in the system," Office Action at 14 (citing Carro ¶ [0080]), and "obtaining the second document if it is not already stored." Office Action at 14 (citing Carro ¶ [0071]). Applicant respectfully disagrees.

First, nothing in the cited text ¶ [0071] or Fig. 4 cited therein discloses "obtaining the second document if it is not already stored." The cited disclosure merely teaches assigning a reference number to each document. Second, ¶ [0080] does not disclose "determining whether the second document is stored in the system." Instead, that disclosure concerns reading the coordinates of hyperlinked items on the page, and updating it with the coordinates. Accordingly, Applicant respectfully requests reconsideration of the rejection of claims 24, 43, and 54.

As to dependent claim 25: The examiner suggests that claim 25 is obvious, and cites Carro and Ingram with Reber. In particular, the examiner suggests that Ingram discloses "including a reference to the first and second targets in the second document" (Office Action at 15, citing Ingram ¶ [0041]), and that Ingram further discloses that the "hyperlink or anchor,

is within a second document.” Office Action at 15 (citing Ingram ¶ [0040]). Applicant respectfully disagrees.

Paragraph 41 of Ingram does not disclose “including a reference to the first and second targets in the second document.” Rather, the cited text continues the discussion of the “anchored” or “docked” web page that the user is visiting. According to the disclosure, the user can hyperlink to “other hyperlinked media” and return to the original, docked web page the user was visiting. The disclosure does not teach or suggest the above limitation of claim 25.

Moreover, ¶ [0040] does not disclose that the “hyperlink or anchor is within a second document.” As remarked above, the cited text discloses opening the hyperlinked page in a window and minimizing that page to the task bar. The cited text does not teach or suggest a second document including a reference to the first and second targets. Accordingly, at least for the reasons indicated in connection with Reber and with Reber in combination with other references, and for the reasons specific to claim 25, Applicant respectfully requests reconsideration of the rejection.

As to dependent claims 27, 31-33, 36-37, 45, and 48-50:

The examiner suggests the above claims are obvious over Reber in further view of Ingram. Office action at 16. Applicant respectfully disagrees, at least for the reasons stated above in connection with Reber, as well as for the reasons delineated below.

As to claims 31-33 and 45, the examiner suggests that Ingram discloses “suppressing a display of a second anchor by taking a snapshot of the anchor, or hyperlink, and including the anchor or hyperlink reference on a taskbar.” Office Action at 17-18 (citing Ingram ¶¶ [0039]-[0041]). Claims 31-33 and 45 do not teach “suppressing display of a second anchor by taking a snapshot . . .”. The specification of the present application discloses that “suppression” of an anchor (or link) is having “all anchors related to an annotated anchor suppressed,” as for example when a reader finds that a document has links to irrelevant information, the reader can cross out an anchor to the unwanted link(s), and the system will suppress all anchors pointing to that target to reduce the visual clutter and distraction associated with deciding whether to follow or annotate the unwanted links. See Specification at ¶¶ [0091]-[0097], Figs. 4, 12.

In contrast, Ingram discloses that links can be docked on the desktop at a tool bar, and that those docked links thereafter can be deleted individually from the tool bar. The Ingram disclosure does not disclose propagating the suppression of an anchor throughout a document and throughout other documents. That is, Ingram does not disclose that an annotation for suppression of an anchor can suppress all of the anchors pointing to the same target, as taught in claims 31-33 and 45, and as disclosed in Applicant's Specification, and in particular, at ¶¶ [0095]-[0096]. Accordingly, at least for these additional reasons, Applicant respectfully requests reconsideration of the rejections.

As to claims 36 and 48, the examiner suggests that Ingram discloses "identifying, in the hypertext structure, a node representing the target and suppressing a display of the node, allowing the reader to see only an item listed in the taskbar." Office Action at 18-19 (citing Ingram ¶ [0040]). Applicant respectfully disagrees.

The present disclosure makes clear that a "node" is a part of the "hypertext structure which represents the target document." Specification at ¶ [0101]. The specification also discloses that "each node . . . represents the target of the respective annotated anchor." Specification at ¶ [0105]. Claim 36 also teaches "a node representing said target . . .", while claim 48 teaches "a node, in a hypertext structure, representing said target . . .". A hypertext structure, as defined in the disclosure, "represent a group of documents and their interconnections . . ." Specification at ¶ [0098]; Figs. 15-15 see also ¶ [0099] ("hypertext structures . . ."). Nowhere in the cited text of Ingram is a hypertext structure or node disclosed, suggested, or taught. Nowhere is *suppression* disclosed, suggested, or taught. Instead, ¶[0040] of Ingram discloses *minimizing* a hyperlinked page to a task bar. Accordingly, at least for this additional reason, Applicant respectfully submits that claims 36 and 48 are allowable over the cited art.

As to claims 37 and 49, the examiner suggests that Ingram discloses "that the code includes identifying, in the hypertext structure, an object representing the link and suppressing a display of the object." Office Action at 19 (citing Ingram ¶ [0054]). Applicant respectfully disagrees. Ingram discloses copying a page and then saving to the hard drive for later viewing. Ingram does not disclose a hypertext structure as do claims 37 and 49. Moreover, in contrast to the disclosure of Ingram, claims 37 and 49 teach suppressing display of an object—

not copying a web page, as in Ingram. Accordingly, at least for these additional reasons, Applicant respectfully submits that claims 37 and 49 are allowable over the cited art.

As to claim 50, the examiner suggests that Ingram "discloses that the annotated anchor represents a link to at least one target, and that the code includes displaying the annotated anchor and the target. Office Action at 20 (citing Ingram ¶ [0047]). Applicant respectfully disagrees. Ingram does not disclose the subject matter taught in claim 50. Rather, the cited text discloses that a user can move a cursor near a hyperlink, and a tool bar having link enhancements can be displayed. In contrast, the subject matter of claim 50 teaches "displaying simultaneously, said annotated anchor and said target." A target per claim 50 does not equate to a tool bar, per Ingram, and an annotated anchor per claim 50 does not equate with the hyperlink per Ingram, because the hyperlink per Ingram is not annotated. Accordingly, for these additional reasons, Applicant respectfully submits that claim 50 is patentable over the cited art.

As to claims 28, 44, and 55: The examiner suggests the above claims are obvious over Reber in further view of Bays. Office action at 20. Applicant respectfully disagrees, at least for the reasons stated above in connection with Reber, as well as for the reasons delineated below.

The examiner suggests that Bays discloses "that annotations may be written to other data items." Office Action at 21 (citing Bays at ¶ [0081]). Applicant respectfully submits that even if Bays does disclose what the examiner suggests, it is immaterial to the patentability of claims 28, 44, and 55, because the disclosure of Bays as characterized by the examiner does not supply any limitation of the subject matter taught in those claims. Specifically, claims 28, 44, and 55 of the present application do not teach writing annotations to data items, as "data items" is defined in Bays. Bays defines an "annotatable data item (i.e., the subsection of database material that can be annotated)" as:

any entity referenced by an index (e.g., an object identifier) or any attribute or subcomponent of such an entity, or any arbitrary set of such items. Examples include a table such as a relational table or spreadsheet, a view such as a relational view, a row within a table, a cell within a table (i.e., the intersection of a column and a row), a column within a

table, an object, an attribute of an object, a set of rows or columns from one table, or a set of rows from different tables.

Bays ¶ [0013].

In contrast, the present claims do not teach propagating to an annotated data item, but rather, to a second or additional anchor: (claim 28) "detecting a second anchor . . . and propagating said annotation *to said second anchor*"; (claim 44) "propagating said annotation *to said second anchor*; and (claim 55) "propagate said annotation *to said identified additional anchors*." For at least this additional reason, Applicant respectfully requests reconsideration of the rejection.

As to claim 29, the examiner suggests Reber and Ingram have been applied against claim 28, from which claim 29 depends. Applicant believes that the examiner intended to suggest that Reber and Bays have been applied against claim 28 and proceeds to remark on the rejection based on that assumption. However, if Applicant is mistaken, Applicant respectfully requests that the examiner so notify Applicant to make any appropriate corrections.

The examiner suggests that Reber discloses that the second anchor is within the document. Office Action at 21 (citing Reber, Fig. 1, elements 32 and 34; Col. 5, lines 50-54). Applicant respectfully disagrees for at least the reasons set forth with regard to Reber, and requests reconsideration of the rejection.

As to dependent claims 30 and 47: The examiner suggests that these claims are obvious over Reber in view of Bays, and in further view of Ingram. Office Action at 21-22. Applicant respectfully disagrees at least for the reasons stated above in connection with Reber, and Reber in combination with Bays, and at least for the reasons delineated below.

As to claim 30, the examiner suggests that Ingram discloses including a reference to the first and second targets in subsequent documents (citing Ingram ¶ [0041]) and that the hyperlink, or anchor, is within a second document. Office Action at 21 (citing Ingram ¶ [0040]). Applicant respectfully disagrees. As discussed above, Ingram does not disclose propagating an annotation to an anchor within the document, or in a second document. Rather, Ingram discloses "anchoring" a page by docking it on the desktop so that the user can visit it when ready. Nothing in Ingram discloses, teaches, or suggests propagating an anchor as contemplated by the present disclosure. Accordingly, for at least this additional reason,

Applicant respectfully requests reconsideration of the rejection.

As to claim 47: The examiner did not include any remarks beyond those in connection with claim 30, and so Applicant accordingly applies Applicant's above remarks addressing claim 30 to claim 47. Applicant respectfully requests reconsideration of the rejection.

As to dependent claims 34, 46, and 56: The examiner suggests that these claims are obvious over Reber, Ingram, and Bays. Office Action at 22. Applicant disagrees for at least the reasons delineated above in connection with Reber, and Reber in combination with Ingram and with Ingram and Bays, and particularly the remarks address the examiner's rejection of claims 28, 44, and 55. For these additional reasons, Applicant respectfully requests reconsideration of the rejections.

As to dependent claims 35 and 47: The examiner suggests that Reber, Ingram, and Bays disclose "the limitations of claims 34 and 36 . . . Ingram also discloses that the code includes identifying, in the hypertext structure, a connecting object representing the link, such as a graphic element, and altering the connecting object, such as reducing its size. Office Action at 23 (citing Ingram at ¶ [0039])). Applicant respectfully disagrees and incorporates herein by reference the remarks above in connection with claims 34 and 36, and 27, 31-33, 36-37, 45, and 48-50. Ingram does not disclose a hypertext structure, but rather, discloses docking a hyperlink at the edge of the computer screen. A hypertext structure according to the present disclosure "represent[s] a group of documents and their interconnections . . ." Specification at ¶ [0098]; see also ¶ [0099] ("Hypertext structures illustrating a large number of interconnections are often very dense and difficult to understand. The process of propagating annotations to hypertext structures 414, described with respect to Fig. 13 makes these structures more distinctive and easier for a reader to understand, as illustrated in Figures 14 and 15"). None of the cited art discloses, teaches, or suggests hypertext structures as disclosed and taught in the present invention.

Moreover, the cited text of Ingram does not disclose, teach, or suggest "a connecting object representing said link." Links are discussed for example at ¶¶ [0105], [0106] of the current specification. A link, or any object selected to represent the link, serves to interconnect nodes or documents in a hypertext structure. The representation of a link can be altered, for example, to appear thicker than other links and/or with an arrow, to indicate that an

annotation is being propagated from one node to another. In contrast, the cited text of Ingram does not disclose that docked hyperlinks are linked in any manner by any object or representation of linking as taught in claims 35 and 47. Accordingly, Applicant respectfully requests reconsideration of the rejection for at least this additional reason.

III. CONCLUSION

In light of the above, it is respectfully submitted that all claims should be allowable, and a Notice of Allowance is requested. The examiner is respectfully requested to telephone the undersigned if she can assist in any way in expediting issuance of the patent.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Dated: May 22, 2006

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